



City of Dania Beach FLORIDA

February 22, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Federal-State Joint Board on Universal Service Lifeline and Link Up CC Docket No. 96-45;
WC Docket 03-109

Dear Chairman Genachowski:


As you know, the Federal-State Joint Board on Universal Service, Lifeline and Link Up (the "Joint Board") recently provided its Recommended Decision to the FCC under the above-referenced docket numbers.

We applaud the Board's efforts to expand the reach of Lifeline, while at the same time pushing forward proposals for greater transparency, efficiency and uniformity on areas such as verification procedures and sampling criteria. Competition amongst Eligible Telecommunications Carriers (ETCs) is thriving and has produced dramatic gains for consumers. These recommendations will ensure a level playing field, increase accessibility and minimize waste, fraud and abuse. This is a critical effort because we concur with the broad consensus of the Joint Board and the FCC determination in America's Broadband Plan that continuing to expand Lifeline and Linkup enrollment must be a priority.

Historically, the low-income support of the fund has had a very low penetration rate. While cost has grown in the low-income support, it is still minimal compared to the area of High Cost. Likewise, it makes little sense to consider adding mandatory, even minimal, monthly subscriber fees for Lifeline users, which would present an undue administrative burden on both carriers and consumers. The best approach to curtailing fraud and abuse is establishment of an eligibility database. Accordingly, we enthusiastically support what we see as broad consensus that no cap should be applied to the low-income portion of the Lifeline and Linkup, and that FCC policies fostering open competition by wireless competitors have fueled the first meaningful increases in Low Income Participation in many years. Finally, it is important to remember that low income support is cyclical: the Great Recession left nearly 10% of the Country unemployed. Lifeline was there to help struggling Americans, and no eligible American should ever be denied Lifeline service because of an arbitrary cap.

We urge the Commission to consider the recommendations outlined in the report, which will foster competition, increase efficiency and expand enrollments. In this vein we reiterate that the Commission should not adopt measures or practices that hinder the Lifeline subscriber or setback the progress being made in expanding enrollments. We are encouraged by the many comments made by the Joint Board and FCC stating that continued expansion of access is a top priority, and we applaud these efforts.

Sincerely,



Walter B. Duke, III
Commissioner, City of Dania Beach

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